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 SINCO TECHNOLOGIES PTE LTD

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

SINCO TECHNOLOGIES PTE LTD,

Plaintiff,

v.

SINCO ELECTRONICS (DONGGUAN) CO.,
 LTD.; XINGLE ELECTRONICS
 (DONGGUAN) CO., LTD.; XINGKE
 ELECTRONICS TECHNOLOGY CO., LTD.;
 SINCOO ELECTRONICS TECHNOLOGY
 CO., LTD.; MUI LIANG TJOA (an
 individual); NG CHER YONG aka CY NG (an
 individual); and LIEW YEW SOON aka
 MARK LIEW (an individual),

Defendants.

Case No. 3:17CV5517

**PLAINTIFF SINCO TECHNOLOGIES
 PTE LTD'S NOTICE OF MOTION &
 MOTION TO SEAL DOCUMENTS
 FILED IN SUPPORT OF ITS *DAUBERT*
 MOTION TO STRIKE THE EXPERT
 REPORT OF DEFENDANTS'
 DAMAGES EXPERT HENRY KAHR
 AND TO PRECLUDE MR. KAHR
 AND ADRIAN FLEISSIG FROM
 TESTIFYING AT TRIAL**

Date: TBD
 Time: TBD
 Courtroom: 5
 Judge: Edward M. Chen

Trial Date: 11/01/2021
 Date Action Filed: 9/22/2017

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on a date and time to be decided by the Court, located at 450 Golden Gate Avenue, San Francisco, California 94102, in Courtroom 5 located on the 17th Floor, before the Honorable Judge Edward M. Chen, Plaintiff, SINCO TECHNOLOGIES, PTE, LTD., ("SinCo") by and through its Attorneys of record, will and hereby does respectfully move for an Order granting SinCo's Motion to Seal Documents in support of its Motion to Exclude the Testimony of Expert Witness Henry Kahrs. This Motion will be based on this Notice of Motion

1 and Motion, the supporting Memorandum of Points & Authorities, the Declaration of Daniel
2 Gaitan ("Seal Decl") and supporting exhibits 1 and 2 attached thereto.

3 The Motion is made on the grounds that pursuant to Civil Local Rule ("L.R."), rules 7-11
4 and 79-5 (Filing Documents Under Seal in Civil Cases) , SINCO moves for an order that records
5 be filed under seal as to Plaintiff's MEMORANDUM OF POINTS & AUTHORITIES IN
6 SUPPORT OF PLAINTIFF SINCO TECHNOLOGIES PTE LTD'S *DAUBERT* MOTION TO
7 STRIKE THE EXPERT REPORT OF DEFENDANTS' DAMAGES EXPERT HENRY KAHRS
8 AND TO PRECLUDE MR. KAHRS AND ADRIAN FLEISSIG FROM TESTIFYING AT
9 TRIAL ("Daubert MOTION") (Including its Memorandum of Points & Authorities (*Seal Decl.* at
10 Exhibit 1), the supporting Declaration of Daniel Gaitan, and the Exhibits B-K (*Seal Decl.* at
11 Exhibit 2), to be lodged with the Court.) SINCO requests the identification of SINCO's United
12 States ("U.S.") customers, the U.S. customer employees that have worked with SINCO, and the
13 project names be redacted as required by contract and pursuant to Civil Local Rule ("L.R."), rules
14 7-11 and 79-5. SINCO anticipates that Defendants will join in this motion based on trade secret
15 objections made at depositions and document designations.

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17 Dated: March 26, 2021

Respectfully submitted,

18 ROPERS MAJESKI PC

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20 By:



21 LAEL D. ANDARA
22 DANIEL E. GAITAN
23 Attorneys for Plaintiff
24 SINCO TECHNOLOGIES PTE LTD
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